

I have been an active licensed amateur for 45 years. I am a Registered Professional Engineer, and a 35 year experienced Electrical Engineer/Systems Engineer.

The provisions of this NPRM constitute the greatest threat to emergency and public service communications provided by the amateur radio service since it's beginning. This simply should not be adopted as proposed.

1. There are inadequate provisions to prevent interference to other licensed services. Amateur Radio depends on weak-signal communications capability. ANY interference of ANY sort is HARMFUL interference. Field tests by ARRL and others vividly illustrate the serious nature of this problem.

2. There are inadequate provisions to prevent licensed services, and individual amateur radio operators from being essentially harassed by individuals who may depend on BPL for personal internet connectivity and who may find their services unavailable due to susceptibility of RF interference from licensed services.

This is similar to what happens when someone's susceptible television, radio, or stereo detects legal transmissions from an amateur radio station. Individuals simply refuse to understand and accept the fact that inadequate selectivity by their cheap consumer electronics is their responsibility. The amateur gets sued, harassed, and generally mistreated.

3. Reports of certain claims being made by lawyers representing power companies who are testing BPL taking the position that "the interference occurring is not HARMFUL interference" illustrates the mistruths that will be used to avoid responsibility for the regulations proposed in this docket, which lack adequate enforcement strength.

4. Claims reportedly being made by FCC representatives that "amateurs already have their antennas designed to avoid interference" are simply technically false and untrue. This also illustrates the complete inadequacy of provisions of this FCC docket and the inability of the FCC to enforce any meaningful provisions of this docket.

In order to avoid the destruction of the various licensed services, such as amateur radio, prevent the inability of licensed services to perform effectively in situations related to homeland security and other situations which are critical to the security of our country, and safety of it's citizens, this docket must be completely disapproved until these flaws are corrected.